

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
\_\_\_\_\_  
DIVISION

2015 JUN 12 PM 3:52  
U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

Tabatha A Tower

(Enter Above the Name of the Plaintiff in this Action)

vs.

Amazon.com Inc

(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

Rosedog Books

Kentbooks

Anybooks

2:15 CV 2405

Judge Marbley

MAGISTRATE JUDGE KEMP

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Tabatha Admetra Tower

Name - Full Name Please - PRINT

1006 E 39th St

Street Address

Lorain, OH 44055

City, State and Zip Code

440-670-5454

Telephone Number

TAT Books  
Tower Productions  
BRT Adventure Books

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. Amazon.com Inc  
Name - Full Name Please  
410 Terry Ave North, Seattle, Wa 98109-5210  
Address: Street, City, State and Zip Code
2. Rosedog Books / Dorrance Publishings  
701 Smithfield St. Third Floor, Pittsburg, PA 15222-3906
3. Kenkebooks c/o Amazon.com Inc  
410 Terry Ave North, Seattle, Wa 98109-5210
4. Anybooks c/o Amazon.com Inc  
410 Terry Ave North, Seattle, Wa 98109-5210
5. \_\_\_\_\_
6. \_\_\_\_\_

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☐ Title 28 U.S.C. § 1343(3)  
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☒ Title 28 U.S.C. § 1331  
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☒ Title 28 U.S.C. § 1332(a)(1)  
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☐ Title \_\_\_\_\_ United States Code, Section \_\_\_\_\_  
[Other federal status giving the court subject matter jurisdiction.]

## III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

- ① Amazon.com Inc was negligent ~~by~~ not exercising due care when paying vendors listing my materials on their website. Amazon.com Inc repeatedly paid Kenkebooks and Anybooks 'first rights' to my copyrighted materials. Amazon paid Kenkebooks for selling more copies than the publisher said was printed. When you log onto Amazon's website to purchase my book, it defaults to Kenkebooks.
- ② Rasedog Book / Dorrance Publishings breached an original contract by merchandising. Merchandising was not a part of the original contract. I requested that Rasedog take the merchandising site down or pay me a percentage for use of my book title on T-Shirts, coffee mugs, etc. They refused to pay the percentage and it took weeks before the materials was off of their site. Also, Rasedog Book, in bitterness and retaliation to the contract being canceled in January 2011, put my book on display on Google.com for anyone to read. I found the ~~entire~~ book <sup>in February 2015</sup> openly displayed, and requested Google to take it down. Google replied that they needed Rasedog's or the copyright owners permission. This process took about two weeks. <sup>ability to make money from</sup> Thus hampering my
- ③ Kenkebooks violated my copyright with repeat sales of <sup>my creative works.</sup> new books that they were printing.
- ④ Anybooks violated my copyright<sup>3</sup> by printing and selling my book. Anybooks advertised over \$1,000,000 books sold.

IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.  
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

<u>Case Number</u>	<u>Caption</u>
_____	_____ vs. _____
_____	_____ vs. _____
_____	_____ vs. _____

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

- ① Amazon - Cease + disist order and remove Kencelbooks and Anybooks from selling my book. Find Amazon negligent ~~to~~ by not exercising due care + due diligence when paying vendors in copyright first rights payment and a judgment for them to pay me all sales money for my book.
- ② Rotedog Books - I would like for the courts to judge against Rotedog for retaliation when they openly published my entire book on Google.com. I am suing Rotedog for \$19,000,000, the book cost \$19.<sup>00</sup> and Google has high hits, much more than 1,000,000 per day. Because of high traffic on google, Rotedog was negligent with this behavior of performing hate crimes.
- ③ Kencelbooks - All sales money back.
- ④ Anybooks - All sales money back.

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 11 day of June, 2015.

  
Signature of Plaintiff